

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICTS OF ARKANSAS  
TEXARKANA DIVISION**

**TROY H. BRADFORD AND GLORIA  
BRADFORD, Individually and as Class  
Representatives on Behalf of All  
Similarly Situated Persons; and  
BOOKS ETC., by and through TROY  
AND GLORIA BRADFORD, Class  
Representatives on Behalf of All Those  
Similarly Situated;**

**PLAINTIFFS**

**VS.**

**Case 4:05-cv-4075 HFB**

**UNION PACIFIC RAILROAD  
COMPANY  
A Delaware Corporation**

**DEFENDANT**

**STIPULATED MOTION TO  
EXTEND TIME TO SUBMIT DISCOVERY RESPONSES**

The Parties file this Stipulated Motion for Extension of Time to Submit Discovery Responses for Plaintiffs to submit discovery responses no later than June 28, 2006 and would show the Honorable Court as follows:

1. Defendant Union Pacific submitted discovery requests pursuant to Fed. R. Civ. P. 33 and 34 on May 31, 2006;
2. Defendant filed on May 31, 2006 their Motion to Shorten Time for Discovery, such Motion requesting that the honorable Court order Plaintiffs to submit responses to the aforementioned discovery within ten (10) days of service thereof rather than the thirty (30) days allowed under the Federal Rules of Civil Procedure;

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3. On June 15, 2006, the Court ordered that Plaintiffs submit their responses to the aforementioned discovery requests within ten (10) days of the Court's Order; such date falling on Sunday, June 25, 2006, the Plaintiffs' responses are due to be submitted on June 26, 2006;
4. Counsel for the Parties have conferred as to the submission date of the aforementioned discovery responses; and have stipulated that such discovery responses may be submitted no later than Wednesday, June 28, 2006, 5:00 p.m.

WHEREFORE, PREMESIS CONSIDERED, the Parties pray that the Court extend the time for Plaintiffs to file their responses to the aforementioned discovery until June 28, 2006.

**RESPECTFULLY SUBMITTED** this 26<sup>th</sup> day of June, 2006,

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s/ Roger W. Orlando  
Roger W. Orlando

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s/ Sean F. Rommel  
Sean F. Rommel

**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I, M. David Karnas, one of the attorneys for the Plaintiffs, hereby certify that on the 26th day of June, 2006, I electronically filed the foregoing Stipulated Motion to Extend Time to File Discovery Responses with the Clerk of this Court using the CM/ECF system which will send notification of such filing to the following attorneys:

**Attorneys for Defendants:**

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s/ M. David Karnas

M. David Karnas